

Stephen Wellinghorst (SW-2998)
HARWOOD LLOYD, LLC
Attorneys for Defendants Daniel Stephens and Putnam County
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY DESKOVIC

Plaintiff,

-against-

CITY OF PEEKSKILL, PUTNAM
COUNTY, WESTCHESTER COUNTY,
DAVID LEVINE, THOMAS MCINTYRE,
WALTER BROVARSKI, EUGENE
TUMOLO, JOHN AND JANE DOE
SUPERVISORS, DANIEL STEPHENS,
LOUIS ROH, MILLARD HYLAND, PETER
INSERO, and LEGAL AID SOCIETY OF
WESTCHESTER COUNTY

Defendants.

DECLARATION OF
Stephen Wellinghorst

No. 7:07-cv-8150 (KMK) (GAY)

ECF Case

STEPHEN WELLINGHORST, an attorney duly admitted to practice law in the Southern District of New York hereby affirms the following under the penalties of perjury:

1. I am an associate in the law firm of Harwood Lloyd, LLC, attorney for the Defendants, Daniel Stephens and Putnam County. I submit this Declaration in support of Defendants, Daniel Stephens' and Putnam County's Motions *in limine*.

2. Annexed hereto are the following exhibits:

A. Excerpts from Judge Karas' September 25, 2012 Opinion and Order (ECF Doc. No. 505);

B. Excerpts from Deskovic v. City of Peekskill, No. 07-CV-8150, 2009 WL 2475001 (S.D.N.Y. Aug. 13, 2009);

- C. Excerpts from Judge Karas' September 22, 2009 Opinion and Order (ECF Doc. No. 238);
- D. October 5, 2011 stipulation discontinuing with prejudice plaintiff's action against settling defendants Westchester County, Louis Roh, and Millard Hyland;
- E. December 14, 2010 stipulation discontinuing with prejudice plaintiff's actions against settling defendants The Legal Aid Society of Westchester County and Peter Inserno;
- F. September 18, 2013 stipulation discontinuing with prejudice plaintiff's actions against settling defendants City of Peekskill, David Levine, Thomas McIntyre, and Eugene Tumolo;
- G. Excerpts from plaintiff's Third Amended Complaint;
- H. Excerpts from Judge Karas' September 22, 2009 Opinion and Order (ECF Doc. 240);
- I. Excerpts from Daniel Stephens testimony at suppression hearing.

Dated: New York, New York
April 14, 2014

YOURS, etc.,

HARWOOD LLOYD, LLC

By: /s/ STEPHEN WELLINGHORST

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